



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK
F. #2016R01805

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 13, 2019

By Email and ECF

All Counsel on Attached Appendix A

Re: United States v. Jeffrey Chartier, et al.
Criminal Docket No. 17-372 (JS)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

The government has made the following materials available at First Choice Copy ("First Choice") for reproduction to the defendants:

Source	Description	First Bates	Last Bates
Ally Bank	Business Records Affidavit for 12/11/2017 Production: Joseph Rodgers, Accounts #4145, #4400, #1613, #3361, #7032, #2518	EDNY-PTP_000635915	EDNY-PTP_000635915
American Express	Business Records Affidavit for 10/12/2017 Production: Stephanie Lee, Accounts #1008, #2006, #3004, #1001	EDNY-PTP_000635916	EDNY-PTP_000635916
American Express	Business Records Affidavit for 10/26/2017 Production: Joseph and Eric Matz, Accounts #2005, #5891	EDNY-PTP_000635917	EDNY-PTP_000635919
AOL	Business Records Affidavit for 1/9/2017 Production: Identity, IP, OSTAT, payment, premium services, and UAS information for hm65577@aol.com, imajon4life@aol.com, nyyankslov3@aol.com, and vettedennis@aol.com	EDNY-PTP_000635920	EDNY-PTP_000635920
AT&T	Business Records Affidavit for 10/23/2017 Production: Subscriber information, CDR report for phone number (631) 501-8613	EDNY-PTP_000635921	EDNY-PTP_000635922

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Source	Description	First Bates	Last Bates
Backpage	Business Records Affidavit for 7/5/2017 Production: Documents from elkap516@gmail.com, jarranper@icloud.com, madisonbanks19@yahoo.comn, melissanicole1219@icloud.com and nicolekurtz@yahoo.com	EDNY-PTP_000635923	EDNY-PTP_000635923
Caliber Home Loans	Business Records Affidavit for 3/6/2017 Production: Victor M. Ramos, Account #2469	EDNY-PTP_000635924	EDNY-PTP_000635924
Charles Schwab	Business Records Affidavit for 5/17/2017 Production: M Watts and R Edee Trustees FBO Christopher Michael Watts, Account #7953K.D Navigation Inc., Account #9136 Geoserve Marketing LLC 401(K), Account #0443	EDNY-PTP_000635925	EDNY-PTP_000635925
Credit One Bank	Business Records Affidavit for 3/7/2017 Production: M Watts and R Edee Trustees FBO Christopher Michael Watts, Account #7953 K.D. Navigation Inc, Account #9136 Geoserve Marketing LLC 401(K), Account #0443	EDNY-PTP_000635926	EDNY-PTP_000635926
E-Trade	Business Records Affidavit for 5/1/2017 Production: E-Trade/Optionshouse, Erik Matz Account #5QD40373	EDNY-PTP_000635927	EDNY-PTP_000635927
E-Trade	Business Records Affidavit for 9/13/2017 Production: Brian Heepke, Account #0127	EDNY-PTP_000635928	EDNY-PTP_000635928
Experian	Business Records Affidavit for 1/19/2017 Production: Keith Miller, Hermann Matz, Karla Hardy, Ronald Hardy, Brian Heepke, Dennis Verderosa, Melissa Kurtzke, Erik Matz, Joseph Matz, Paul Ewer	EDNY-PTP_000635929	EDNY-PTP_000635930
Fedwire	Business Records Affidavit for 8/18/2017 Production: Potentially responsive electronic wire transfers	EDNY-PTP_000635931	EDNY-PTP_000635933
Fidelity	Business Records Affidavit for 5/2/2017 Production: Acosta Interactions, Forsgren Interactions, Matz Interactions	EDNY-PTP_000635934	EDNY-PTP_000635935
First National Bank of Omaha	Business Records Affidavit for 1/31/2017 Production: Dennis Verderosa, Account #9792	EDNY-PTP_000635936	EDNY-PTP_000635936
First National Bank of Omaha	Business Records Affidavit for 2/9/2017 Production: Melissa Kurtzke, Account #2080	EDNY-PTP_000635937	EDNY-PTP_000635937
First Premier Bank	Business Records Affidavit for 2/28/2017 Production: Robert Gilbert, Account #2082	EDNY-PTP_000635938	EDNY-PTP_000635938
Huntington Beach	Business Records Affidavit for 6/16/2017 for: Robert K. Cordes, Account #7119	EDNY-PTP_000635939	EDNY-PTP_000635939
Merrick Bank	Business Records Affidavit for 1/31/2017 Production: Dennis Verderosa, Account #3673	EDNY-PTP_000635940	EDNY-PTP_000635941

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Source	Description	First Bates	Last Bates
Merrick Bank	Business Records Affidavit for 2/21/2017 Production: Robert Gilbert, Account #1992	EDNY-PTP_000635942	EDNY-PTP_000635943
Merrick Bank	Business Records Affidavit for 3/22/2018 Production: Victor Ramos Jr., Account #0076	EDNY-PTP_000635944	EDNY-PTP_000635945
Morgan Stanley	Business Records Affidavit for 5/31/2019 Production: Bluesheet data for HECC and NWMH	EDNY-PTP_000635946	EDNY-PTP_000635946
Optionshouse	Business Records Affidavit for 3/6/2018 Production: Clifford Jenne, Account #4ZE-18599-19 RR AG6	EDNY-PTP_000635947	EDNY-PTP_000635947
Payomatic	Business Records Affidavit for 11/9/2016 Production: Melissa Kurtzke, Account #8934	EDNY-PTP_000635948	EDNY-PTP_000635949
Rackspace	Business Records Affidavit for 4/3/2017 Production: Subscriber information for Levellogic, Inc.	EDNY-PTP_000635950	EDNY-PTP_000635950
Santander Bank	Business Records Affidavit for 2/10/2017 Production: Hermann Matz	EDNY-PTP_000635951	EDNY-PTP_000635951
Sperry	Business Records Affidavit for 6/14/2017 Production: Adam Fisher, Acct #8138	EDNY-PTP_000635952	EDNY-PTP_000635952
Sprint	Business Records Affidavit for 1/29/2017 Production: Kristina Guiliano subscription information, phone number (631) 236-7669	EDNY-PTP_000635953	EDNY-PTP_000635953
TD Ameritrade	Business Records Affidavit for 12/1/2016 Production: Melissa Kurtzke, Account #4123	EDNY-PTP_000635954	EDNY-PTP_000635954
TD Bank	Business Records Affidavit for 1/31/2017 Production: Audio recordings Verint Multimedia re Big Little Consulting, Dacona	EDNY-PTP_000635955	EDNY-PTP_000635955
T-Mobile	Business Records Affidavit for 2/17/2017 Production: Ronald Hardy subscriber information, phone number (631) 482-0918 Jeffrey Chartier subscriber information, phone number (917) 414-6648	EDNY-PTP_000635956	EDNY-PTP_000635956
TradeStation	Business Records Affidavit for 5/25/2017 Production: Awesome Restaurant Excursions, LL; Ross McKie; Seven Investre LLC; R3 Trading Partners, LLC	EDNY-PTP_000635957	EDNY-PTP_000635957
UBS Financial Services	Business Records Affidavit for 1/27/2017 Production: Robert Gleckman, Accounts #8257, #6143, #6157	EDNY-PTP_000635958	EDNY-PTP_000635958
Umpqua	Business Records Affidavit for 2/9/2017 Production: Clifford B Jenne Revocable Living Trust, Accounts #0474, #5313 Emily L Jenne Irrevocable Family Trust Account #5321	EDNY-PTP_000635959	EDNY-PTP_000635960
US Bank	Business Records Affidavit for 3/21/2017 Production: Joseph Matz, Account #4500	EDNY-PTP_000635961	EDNY-PTP_000635961
Valley National Bank	Business Records Affidavit for 6/27/2017 Production: Benjamin Conde / Essex Global Investment Corp, Account #7069	EDNY-PTP_000635962	EDNY-PTP_000635962

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Source	Description	First Bates	Last Bates
Verizon	Business Records Affidavit for 5/1/2017 Production: Account records for phone number (336) 025-7626	EDNY-PTP_000635963	EDNY-PTP_000635968
Verizon	Business Records Affidavit for 10/12/2017 Production: Account records for phone numbers (631) 275-6912, (631)275-6812	EDNY-PTP_000635969	EDNY-PTP_000635974
Verizon	Account records for phone numbers (917) 414-6648, (917) 806-0860	EDNY-PTP_000635975	EDNY-PTP_000637157
Rackspace	Lawrence Isen Rackspace email account emails - RBNW	EDNY-PTP_000637158	EDNY-PTP_000637158

Where affidavits concerning the authenticity of business records are included herein or in previous discovery productions, per Federal Rules of Evidence 803(6) and 902(11) the government intends to proffer those records into evidence at trial as self-authenticating. See United States v. Komasa, 767 F.3d 151 (2d Cir. 2014).

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

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cc: Clerk of the Court (JS) (by ECF)

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